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Cameron Winklevoss, Tyler Winklevoss,
10 and Divya Narendra

11
12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN JOSE DIVISION

15 THE FACEBOOK, INC. and MARK
ZUCKERBERG,

16 Plaintiffs,

17 v.

18 CONNECTU, INC. (formerly known as
CONNECTU, LLC), PACIFIC NORTHWEST
19 SOFTWARE, INC., WINSTON WILLIAMS,
and WAYNE CHANG,

20 Defendants.
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Case No. 5:07-CV-01389-JW

**ADMINISTRATIVE MOTION TO
SEAL:**

**UNREDACTED THIRD PARTY
COMPLAINT**

1 Pursuant to Civil L.R. 7-11 and 79-5(d), proposed third party intervenors
2 Cameron Winklevoss, Tyler Winklevoss, and Divya Narendra respectfully submit this
3 administrative motion asking the Court to file under seal their unredacted THIRD
4 PARTY COMPLAINT because it contains reference to the financial terms of settlement
5 from a mediation term sheet that Judge Ware has kept sealed and contains reference to
6 information that Plaintiffs have alleged is confidential.¹ A redacted version of the
7 complaint was electronically filed on July 31, 2008, and is available to the public (Docket
8 No. 577).

9 Accordingly, the third party intervenors request their unredacted THIRD PARTY
10 COMPLAINT remain sealed.

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14 August 1, 2008

Respectfully submitted,

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16 BYRNE & NIXON

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18
19 /s/ Mark A. Byrne

20 Mark A. Byrne

21
22 O'SHEA PARTNERS

23
24 /s/ Sean F. O'Shea

25 Sean F. O'Shea

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27 ¹ ConnectU, Cameron Winklevoss, Tyler Winklevoss, and Divya Narendra do not waive any arguments
28 or rights as to (i) the admissibility or inadmissibility of evidence surrounding the purported agreement, (ii) the confidentiality or non-confidentiality of information relating to the purported agreement, or (iii) the enforceability or unenforceability of the purported agreement.

1 **PROOF OF SERVICE**

2 I am employed in the County of Los Angeles, State of California. I am over the
3 age of 18 and not a party to the within action. My business address is **800 West Sixth
Street, Suite 430, Los Angeles, California 90017.**

4 I have caused the service of **ADMINISTRATIVE MOTION TO SEAL:**
5 **UNREDACTED THIRD PARTY COMPLAINT** on the following parties by
6 electronically filing the foregoing with the Clerk of the District Court using its ECF
System, which electronically notified the following:

7 Chester Wren-Ming Day (cday@orrick.com)
8 D. Michael Underhill (munderhill@bsflp.com)
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24 I declare under penalty of perjury that the foregoing is true and correct.

25 Executed on August 1, 2008, at Los Angeles, California.

26 _____/s/Mark A. Byrne
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